

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

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GREGORY MACLEAN, RICK VALLES,  
 ARDESHIR PEZESHKI, JAMES GIBBS, and  
 RONALD HEMENWAY, *individually and in*  
*their representative capacities,*

Plaintiffs,

v.

WIPRO LIMITED,

Defendant.

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**Civil Action No. 3:20-cv-3414 (GC) (JBD)**

**JOINT PROPOSED DISCOVERY  
 SCHEDULE**

Scheduling Teleconference: June 29, 2023

In accordance with this Court's May 31, 2023 Order (Dkt. 39) denying Defendant's request to bifurcate discovery, the parties met and conferred on June 19, 2023 regarding how discovery should proceed in this case. The parties have reached consensus and now submit the below joint proposed discovery schedule:

<b>Event</b>	<b>Deadline</b>
<b>Service of Initial Written Discovery</b>	July 14, 2023
<b>eDiscovery conference pursuant to L. Civ. R. 26.1(d)</b>	July 27, 2023
<b>Deadline to Amend Pleadings and/or Add Parties</b>	October 12, 2023
<b>Non-Expert Discovery Cut-Off</b>	May 23, 2024
<b>Class Certification Motion Filing Deadline<sup>1</sup></b> <b>Initial Expert Disclosure &amp; Report Deadline</b>	July 25, 2024

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<sup>1</sup> If a class is certified, the parties may file supplemental expert reports for trial by the Expert Discovery Cut-Off deadline.

<b>Event</b>	<b>Deadline</b>
<b>Opposition to Class Certification Motion</b>	August 22, 2024
<b>Rebuttal Expert Disclosure &amp; Report Deadline</b>	
<b>Reply in Support of Class Certification Mot.</b>	September 12, 2024
<b>Dispositive Motions</b>	December 19, 2024
<b>Responses to Dispositive Motions</b>	January 23, 2025
<b>Replies to Dispositive Motions</b>	February 13, 2025
<b>Expert Discovery Cut-Off</b>	March 6, 2025
<b>Class-Wide Settlement Conference Deadline</b>	April 3, 2025
<b>Pretrial Conference</b>	April/May 2025
<b>Trial (Jury Trial)</b>	May/June 2025

We look forward to discussing the proposed schedule with the Court at the June 29, 2023 teleconference and thank the Court for its attention to this matter.

Dated: June 21, 2023

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